

**Rule 21 Working Group Meeting #43**  
**April 21, 2003**  
**California Energy Commission**  
**1516 9<sup>th</sup> Street**  
**Sacramento, CA**  
**9:30 am – 4:00 pm**

**Attendees:**

**Chair:** Scott Tomashefsky

**Participants:**

Aldridge, Pat	SCE	Minnier, Randy,	MPE Consulting
Alvarez, Manuel	SCE	Panora, Bob,	Tecogen
Arthur, Chuck	Arthur Eng.	Rawson, Mark	CEC
Ball, Greg	PowerLight	Ross, James	CAC/EPUC
Blumer, Werner,	CPUC	Ruth, Lee	World Water
Brown, Gary	CA-ISO	Sachitano, Annie	CAC/EPUC
Burnham, Petrina	SDG&E	Salour, Dara	RCM Digesters
Cook, William	SDG&E	Sheldon, Kent	SMA
Dossey, Tom	SCE	Sheldon, Kent	SMA
Duggan, Kevin	Capstone	Skeen, Jim	SMUD
Grebel, Ed	SCE	Solt, Chuck	Lindh and
Iammarino, Mike	SDG&E	Associates	
Iliev, Karl	SDG&E	Thorne, Tony	Xantrex
Luke, Robin	RealEnergy	Thorne, Tony	Xantrex
Martini, Bill	Tecogen	Torribio, Gerry,	SCE
Mazy, Anthony	CPUC/ORCA	Woods, Leon	World Water

The meeting was called to order.

1. The next Working Group meeting will be held at SDG&E's offices in San Diego, Tuesday May 20.
2. The meeting used the Action Items List to prioritize and discuss issues, first discussing the Action Items List was discussed and the manner of its use. The List is divided into Process, Technical and Common issues. Common issues were discussed in the combined meeting, and process and technical issues were discussed in breakout sessions. At the end of the breakout sessions, a combined wrap-up session was held.
3. Jerry Jackson of PG&E spoke about the Expanded E Net program. Jerry reported that summary information on the DG applications is available from Scott Tomashefsky at the CEC if anyone needs it.

4. Scott T requested that broad issues regarding DG Interconnection that may require regulatory attention should be brought to his attention. CEC is considering whether to start a new DG regulatory proceeding. The proceeding could consider what is needed to comply with the recent CPUC Departing Load charges decision, such as how the first exempt 3000 MW will be tracked and counted; the process for the new proceeding should be defined in a month
5. It was generally agreed that Export of power should be part of Rule 21. Several layers of export should be evaluated by the Tech Subgroup. For each of these, the applicability of Rule 21 would then be considered.
6. The technical subcommittee discussed the export issue and determined that it should be addressed in two ways: what type or level of export that should be allowed to pass the Initial Review Process and how export should be handled in Supplemental Review (already addressed in the Supplemental Review Guideline)
7. The technical subcommittee reviewed the proposed changes to IRP screen 2 for Export (Item C101). Several changes were made and have been subsequently circulated for comments.
8. Bill Cook of SDG&E presented a definition of Inadvertent Export (T105).
9. Reviewed T107, proposed changes to the Supplemental Review Guideline to include alternative tests for protection relays. Little was resolved because primary author Moh Vaziri was not in attendance.
10. SDG&E reported that Application Form revisions are being cleaned up and should soon be resolved. Application is now up to 15 pages! IOUs will first get their act together after which it will be sent out to industry
11. PG&E would like to have cost data (project costs for Interconnections, E Net and other Rule 21) continue to be tracked, and also to meet with other Utilities to evaluate why costs appear to be different between them and whether process improvements can be implemented. SCE is willing to meet and talk with PG&E about the costs.
12. Pat Aldridge presented the requirements related to CPUC Decision 03-02-06 that directs Utilities to evaluate DG as an option for Distribution System upgrades.
13. Scott Tomashefsky was considering a review of the dispute resolution process. Pat Aldridge stated that there is an established dispute resolution process that is part of CPUC regulation. It was decided that Pat would retrieve the process and present it at the next Working Group meeting. The Working Group will then debate whether and how to include a reference to the process in Rule 21.
14. It was decided that any potential changes to Rule 21 that may require an Advice Letter filing by the utilities should be completed by the end of August, so that a single Advice Letter will cover all significant changes. Changes that cannot be ready for an Advice Letter by the end of August should be deferred or shelved.
15. The Action Items List was updated during the meeting, and an updated list has already been circulated to the Working Group. The Action Items List contains the

status and responsibilities for several other items that were discussed at the meeting. The Action Items List updated during the meeting is attached.

Respectfully Submitted:

Edan Prabhu  
Reflective Energies

Approved:

Scott Tomashefsky  
CEC

Item No.	Priority	Issue	Related Document	Champion	Comment or Next Action	Next Action Due	Completion Due	Completed
C101	H	How should Rule 21 handle export of power? Clarify Option 3 of the Screen? Change rule to prohibit export except where allowed?	Rule 21	Dossey (N)/ Whitaker(T)	Whitaker to set up several forms of power export (incidental, PURPA, momentary, etc., and evaluate what the technical requirements are for each.	5/13/03		
C105	J	DG Application Lists by IOU	All					
C106	J	DG Monitoring Update	All					
C107	X	Update Definitions and develop Glossary	Rule 21	Prabhu	All to provide input to Edan	4/15/03		
C102	Z	FERC ANOPR for Small Gens						
C104	Z	Solicit other suggested changes to Rule 21						

P102	H	Revise Sections I and J	Rule 21	Tomashefsky	This work will be coordinated with changes needed to incorporate IEEE P 1547 impact	4/15/03		4/21/03
P108	H	Revise Application Form	Appl Form	Iammarino	Iammarino to obtain Utility Comments and send out to Working Group	5/13/03		
P104	J	Draw lessons from cost data collected so far	CPUC Order	Jackson	Jerry will report on progress from time to time; the goal is to improve processes and reduce costs by cross-pollinating the experiences of IOUs			
P105	X	Develop Rationale for tracking of Interconnection costs in future		Dossey	Tom deferred to Jerry on action P104			4/21/03
P106	X	Certification Issues: Term of Certification, Decertification etc.		Jackson	Jerry will identify the issues that need attention	5/13/03		
P109	J	CPUC Proceedings on DG in lieu of line upgrade, CPUC Decision D-03-02-068	CPUC Order	Aldridge	Scott will discuss with CPUC what actions fall to the CEC and report to the Working Group; Bill inserts, tracking of Generation totals etc.	5/13/03		
P110	X	CPUC draft decision R99-03-02-068	R99-03-02-068	Aldridge	Incorporated into P109			4/21/03

P111		Dual generators at one site (one of which qualifies for Net Metering) and other Net Metering related changes needed for Rule 21 DEFER TO T117	Rule 21	Dossey	Tom to provide written narrative describing the issue	5/20/03		
P103	Z	Revise Dispute Section G	Rule 21	Tomashefsky/Aldridge (next action)	Pat will provide Dispute Resolution lang from Rule 10 and recommend referencing it in Rule 21	5/13/03		
P107	Z	Net Generation Metering	Rule 21		Transfer to list requiring a separate proceeding			4/21/
P101	Z	Distinguish Rule 21 Certified Eqpmt List from other lists (on web page)		Needs a champion or this is history		5/20/03		
T101	Z	Review Impact of IEEE P1547 on Rule 21 and propose changes to Rule 21 Sections I, J etc.	IEEE P1547, Rule 21	Needs a Volunteer	Wait until IEEE P 1547 is published			
T103	H	Disconnect Switch Reqmts	SupRev	Lacy	Lacy will obtain comments from others and provide written input	5/13/03		
T104	H	Nominal Voltage Definition	SupRev	Edds	Edds provide a write-up defining the issue	5/13/03		
T105	H	Inadvertant Incidental export etc.	SupRev	Cook	Solicit Comments and revise	5/30/03		
T106	X	Clarify Anti-islanding Test for Synch and Induction m/cs	TBD	Whitaker				
T107	H	Clarify issue of "Utility-approved" protective function/eqmt. Define reqmts for relays (for non-certified eqpmt)	SupRev	Vaziri/ Whitaker	Chuck will discuss with Mo and define issue	5/13/03		
T108	L	Bibliography in electronic form	Web Page	Gardner				
T109	L	Tech aspects of metering		Mazy	Same as item N107			3/19/03
T110	L	Networks		Skeen	Define the issue	4/15/03		
T111	L	Modify Section D.1.h; interconnection of DGs whose reqmts are not covered by Rule 21	Rule 21	Mazy				
T112	L	Clarification of non-islanding, anti-islanding, active, active-anti-islanding, positive anti-islanding		Whitaker				
T113	X	Review potential impact of IEEE 1547.1 etc	IEEE 1547.1 etc		Find a champion	4/22/03		
T121	X	Errors in SupRev WERNER: COMPLETED, ERRORS CORRECTED		Blumer	Make sure errors are corrected			
T114	Z	Loss of Synchronization Reqmts						
T115	Z	Clarify Anti-islanding Test Synch and Induction m/cs (duplicate of T112)						4/21/03

T116	Z	Clarify use of Transfer Switch Pkg in D.1.b; clarify use of 2 sec. Allowance in J.7.a(3) method 2 vs. 1 sec. For Momentary parallel						
T117	X	Clarify I.3.b(2) to say that the reverse or minimum power relay does not have to be at the PCC, to allow for eligible and non-eligible generators on the same service acct, as reqd in CPUC decision R99-10-025, issued 1/10/03 WERNER SUGGESTION "DELETE 'AT THE PCC IN 1.3B OPTIONS 1 & 2	Rule 21	Cook/Minnier	Define the issue, provide alternative language. Refer to the PUC decision.	5/21/03		
T118	Z	Define Term "promptly" in D.3.b(2) (2 secs) Define relationship between D.3.b.1 and 2						
T119	Z	Investigate the probability of Islanding						
T120	Z	Place a disclaimer on the SupRev webpage						3/19/03
<b>Legend</b>								
<b>C: Combined Group Issue</b>			<b>J: Ongoing Item; Report Updates periodically</b>					
<b>T: Technical Subgroup Issue</b>			<b>X: Priority not Yet Established</b>					
<b>N: Non-Technical Group Issue</b>			<b>Z: Inactive or Informational</b>					
<b>H: High</b>			<b>ZZZ: Dead - Decision made to not address this issue</b>					
<b>L: Low</b>								

Clarify anti-islanding Test for Synch and Induction m/cs (Same as T106)